

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

MOMODOU TAAL,

Plaintiff-Petitioner,

MŪKOMA WANGŪGĪ, and SRIRAM
PARASURAMA,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; U.S.
DEPARTMENT OF STATE; MARCO RUBIO, in
his official capacity as Secretary of the U.S.
Department of State; PAMELA BONDI, in her
official capacity as Attorney General, U.S.
Department of Justice; U.S. DEPARTMENT OF
HOMELAND SECURITY; KRISTI NOEM, in her
official capacity as Secretary of the U.S.
Department of Homeland Security; TODD M.
LYONS, in his official capacity as Acting Director,
U.S. Immigration and Customs Enforcement; and
THOMAS BROPHY, in his official capacity as
Field Office Director of the Buffalo Immigration
and Customs Enforcement Office,

Defendant-Respondents.

**[PROPOSED] ORDER TO SHOW
CAUSE**

Civil Action No. 3:25-cv-00335-ECC-
ML

Upon the annexed Memorandum of Law, Affidavit of Eric Lee dated March 27, 2025,
Declaration of Momodou Taal dated March 27, 2025, and exhibits thereto, it is

ORDERED that the above named Defendants show cause before this Court, at Room _____,
United States Courthouse, 100 South Clinton Street, in the Syracuse, New York, on March
_____, 2025, at _____ o'clock, in person or telephonically, or as soon thereafter as counsel may be
heard, why an order should not be issued pursuant to Rule 65 of the Federal Rules of Civil
Procedure:

- 1) enjoining Defendants-Respondents from detaining the Plaintiff-Petitioner pending a

further order of the Court;

- 2) enjoining Defendants-Respondents from transferring the Plaintiff-Petitioner from the jurisdiction of this District pending further order of the Court; and
- 3) should Defendants-Respondents seek to detain Plaintiff-Petitioner on any asserted basis other than pursuing his removal under 8 U.S.C. § 1227(a)(1)(B) pending the Court's decision on a preliminary injunction, ordering Defendants-Respondents to provide sufficient advance notice to the Court and counsel, in order to enable Plaintiff- Petitioner an opportunity to be heard regarding whether any such asserted basis for detention constitutes a pretext for First Amendment retaliation.

ORDERED, that answering papers, if any, must be served by email on Plaintiff-Petitioner's attorneys of record in this action no later than 5:00 p.m. on _____, 2025, and reply papers, if any, must be served by hand or email upon Defendants-Respondents' attorneys no later than 5:00 p.m. on _____, 2025; and it is further

ORDERED that service by email of a copy of this Order and the annexed Declarations, exhibits, pleadings, and memoranda of law upon the Defendants-Respondents' counsel that have appeared in this action as of the issuance of this order, or otherwise on the Ethan Kanter of DOJ OIL, on or before ___ o'clock in the _____ morning/afternoon, _____, 2025, shall be deemed good and sufficient service thereof.

IT IS SO ORDERED.

Dated: _____, 2025
Syracuse, New York

United States District Judge